

CHADBOURNE

PARKER

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1/3/13

ENDOSED ORDER

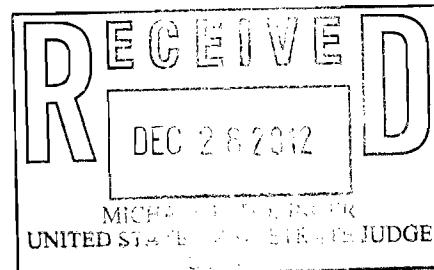
Application granted.

12/28/12

December 27, 2012

VIA HAND DELIVERY

Hon. Michael H. Dolinger,
United States Magistrate Judge
United States District Court for the
Southern District of New York
500 Pearl Street, Room 1670
New York, NY 10007-1312



Re: St. Paul Fire & Marine Ins. Co. v. Aseguradora de Creditos y Granatias, S.A.
12-Civ-4627 (LAK) (MHD)

Dear Judge Dolinger:

We represent plaintiff, St. Paul Fire & Marine Insurance Company ("St. Paul"). We write to report on the status of plaintiff's efforts to effect service on defendant in the Republic of Argentina, and to request a further 45 day extension of time within which to complete service and to file an affidavit attesting so. Plaintiff's current deadline for completing service is January 2, 2013.

As we explained in our last letter (dated November 15, 2012), we had retained TransPerfect Legal Solutions ("TransPerfect") to translate the summons, complaint and ancillary documents (the "Litigation Papers"), and to effect service of the Litigation Papers upon defendant, Aseguradora de Creditos y Granatis, S. A. ("ACG"), in Argentina in accordance with the Hague Convention. The Litigation Papers were delivered to the Argentine Central Authority in November 2012.

Last week, and, then again, today we telephoned TransPerfect to determine whether the Argentine Central Authority had issued a return of service, confirming delivery of the Litigation Papers to ACG. As yet, the Argentine Central Authority -- an entity over which St. Paul exercises no control -- has not yet confirmed delivery of the Litigation Papers to ACG.

St. Paul has done everything within its power to complete service upon ACG under the Hague Convention. Plaintiff must continue to await action by the Central Authority in Argentina. Given these circumstances, plaintiff respectfully requests an extension of the

CHADBOURNE
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Hon. Michael H. Dolinger,

-2-

December 27, 2012

St. Paul has done everything within its power to complete service upon ACG under the Hague Convention. Plaintiff must continue to await action by the Central Authority in Argentina. Given these circumstances, plaintiff respectfully requests an extension of the January 2, 2013 deadline for completing service. Plaintiff proposes an extension to February 18, 2013. Please let us know whether this extension is acceptable to the Court.

Respectfully,



John F. Finnegan

cc: David Y. Livshiz, Esq.
David M. Raim, Esq.



CPAM: 5130887.1